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September 12, 2025

Via CM/ECF

The Honorable Tonianne J. Bongiovanni
United States Magistrate Judge
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Building
and United States Courthouse
402 East State Street, Trenton, NJ 08608

Re: *Kumar, et al. v. Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc., et al.*, No. 21-CV-11048 (GC)(TJB)

Dear Judge Bongiovanni:

Our office, along with Radford Scott LLP and Kakalec Law PLLC, represents Plaintiffs Mukesh Kumar, Davi Laal, Niranjana, Mahendra Kumar, Rama Ram, Ramesh Kumar, Deva Ram, Rupa Ram, and Khima Ram Rebari in the above-referenced case. We write to provide the Court with an update as directed in the Court's April 17 21, 2025 Order (Docket # 78.)

This week, we asked the government for an update on the status of the criminal investigation and were informed that the government investigation is still open. The government could not provide any timeframe as when there might be a conclusion to that investigation. We believe the transition in the U.S. Attorneys' Office for the District of New Jersey has impacted the investigation's process. Because of the extraordinary delay—this case has been stalled for over four years—we are today filing a motion to lift the Trafficking Victims Protection Act stay, *see* 18 U.S.C. § 1595(b) or, in the alternative, to sever the wage-and-hour claims so they may proceed outside the constraints of the TVPA stay.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Andrew I. Glenn
Andrew I. Glenn, Esq.

*Counsel for Plaintiffs Mukesh Kumar, Davi
Laal, Niranjan, Mahendra Kumar, Rama
Ram, Ramesh Kumar, Deva Ram, Rupa
Ram, and Khima Ram Rebari, the Proposed
FLSA Collective, and the Proposed Classes*

cc: All counsel of Record (via CM/ECF)